

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

REGINALD MCCURDY,
KING STEVENSON,
ANGELINA VENTURA,
KATRINA STERLING,
CHERRELL GLENN,

Defendants.

INDICTMENT

1:24 CR 00184

CASE NO.:

Title 21, United States Code,
Sections 841(a)(1), (b)(1)(A),
(b)(1)(B), (b)(1)(C), 843(b), and
846; Title 18, United States
Code, Sections 1952(a)(3), and 2

JUDGE BRENNAN

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl,
21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A) and (b)(1)(C))

The Grand Jury charges:

1. From on or about November 19, 2019, to on or about June 1, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants REGINALD MCCURDY, KING STEVENSON, ANGELINA VENTURA, KATRINA STERLING, and CHERRELL GLENN did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with diverse others known and unknown to the Grand Jury, to possess with intent to distribute and to distribute a detectable amount of fentanyl, a Schedule II controlled substance. As to Defendants MCCURDY and STEVENSON, those Defendants conspired to possess with the intent to distribute and to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in

violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A). As to Defendants VENTURASTERLING, and GLENN, those Defendants conspired to possess with the intent to distribute and to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that:

A. STEVENSON obtained kilogram quantities of fentanyl for distribution to customers who were part of the Drug Trafficking Organization (“DTO”) in the Cuyahoga County, Ohio, area.

B. STEVENSON distributed fentanyl, cocaine, and methamphetamine to MCCURDY, who redistributed the fentanyl to customers in the Cuyahoga County, Ohio, area.

C. VENTURA accepted parcels mailed from Arizona at her residence in Brunswick, Ohio, that contained fentanyl to be given to MCCURDY.

D. VENTURA ordered and accepted tablet pressing powder and a tablet pressing machine and distributed these to MCCURDY for the purpose of furthering the DTO.

E. STERLING allowed other members of the DTO, including MCCURDY, to use vehicles registered in her name to distribute fentanyl to customers.

F. A person known to the Grand Jury mailed parcels containing fentanyl to MCCURDY to distribute fentanyl to customers in the Cuyahoga County, Ohio, area.

G. MCCURDY directed other members of the DTO on how to safely handle fentanyl.

H. MCCURDY and GLENN utilized the bank account information of STEVENSON to deposit a drug debt owed to STEVENSON.

I. GLENN picked up fentanyl and redistributed the fentanyl in Cleveland, Ohio for REGINALD MCCURDY.

J. GLENN, STERLING, and others maintained and stored fentanyl at a residence used by MCCURDY to distribute fentanyl in Cleveland, Ohio.

K. Conspirators used multiple telephones to conduct drug trafficking activity by making and receiving telephone calls and sending and receiving text messages to communicate.

L. Conspirators, when using cellular telephones or text messaging to conduct drug trafficking activity, used slang terms, street terminology, and code words and phrases to obscure and disguise the true nature of their activities and the true meaning of their conversations.

ACTS IN FURTHERANCE OF THE CONSPIRACY

3. In furtherance thereof, and to effect and conceal the existence of the conspiracy, the Defendants and others performed acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

4. On or about November 10, 2019, MCCURDY mailed and or directed someone to mail a USPS Priority Mail parcel no. 9505511026089313342207 addressed to Mrs. Williams, XXX E. 255th Euclid, Ohio 44132, and having a return address of Marcus Taylor, XXXXX [no street listed], Litchfield Park [no state listed] 85340 (hereinafter “parcel-2207”) containing a glass canning jar with 1,300 blue tablets, marked as Oxycodone 30 mg, which contained 163.25

grams of a mixture of 4-ANPP, a schedule II controlled substance, and fentanyl, a schedule II controlled substance.

5. On or about May 29, 2020, at approximately 8:07 a.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, “Yo if you could drop them blues [fentanyl pills] off to Kim I’ll give you 4.” STEVENSON replied, “How many?” MCCURDY texted, “Good looking a band [1,000 tablets].” MCCURDY texted, “How much for 1500.” STEVENSON texted, “5300 is my price, I’ll give you my price.” Later, STEVENSON texted, “All he got is 1k right now so ima grab the 1k.” After this, STEVENSON and MCCURDY then engaged in three WhatsApp voice calls. Following these voice calls, MCCURDY and STEVENSON engaged in a text message conversation where STEVENSON texted, “She got em.”

6. On or about June 8, 2020, at approximately 1:26 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, “Let me get another band [1,000-unit doses of fentanyl pills] . . . Ok I’m tell Kim to give you 37 [\$3,700].” STEVENSON replied, “Tomorrow kool I gotta get some bread together.” STEVENSON replied, “I got em she ready.” REGINALD MCCURDY replied, “Yeah.”

7. On June 9, 2020, at approximately 11:40 a.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON texted, “U still need that right? . . . I couldn’t get around to it last night.” MCCURDY replied, “Yeah.” MCCURDY texted, “You no what time you gone be there.” STEVENSON replied, “About 8 after traffic I gotta go cash him out.”

8. On June 9, 2020, at approximately 8:32 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON texted, “20 minutes out.”

9. On July 4, 2020, at approximately 10:19 a.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, “I need some blues [M-30 tablets] . . . Band [1,000-unit doses of fentanyl pills].” STEVENSON replied in a text, “Did u dump the other ones?” MCCURDY replied, “I still got like 300 left.” STEVENSON replied, “Ok I just wanted to make sure u a lose all ur bread.” MCCURDY texted, “People was OD off them so I put them in cut.”

10. On or about September 7, 2020, at approximately 11:37 a.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON texted, “I wanna see if I can send blues to u for 5.00 anything I can do will help . . . Every rack counts right now.” STEVENSON then texted photos of his residence at XXXX Melody Dr., Phoenix, Arizona.

11. On or about October 5, 2020, at approximately 10:50 a.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, “Put in order on the blues I just need 1[1,000 tablets].” STEVENSON replied, “When u need them.” MCCURDY replied, “Today.” STEVENSON texted, “Aiiit . . . I’ll have my boy pull up when u ready.” STEVENSON replied, “I got em” and “U can come whenever.”

12. On October 6, 2020, MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, “Ok.” STEVENSON replied, “I’m up” and “It’s 2 pills short I had to let somebody test them.” MCCURDY texted, “Ok after Kim get done cooking I’ll be over there” . . . “I’m about to pull up.”

13. On or about October 30, 2020, at approximately 6:32 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON sent a photo of what appeared to be a kilogram of cocaine and MCCURDY replied to the image, "That's girl." STEVENSON replied, "Yea . . . That's where the money at for me now."

14. On November 2, 2020, MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, "Send me one, I got 40 up here." STEVENSON replied, "In a few weeks."

15. On November 7, 2020, a person known to the Grand Jury sent MCCURDY a picture of a USPS tracking number corresponding to a parcel being sent to Cleveland, Ohio.

16. On February 12, 2021, a person known to the Grand Jury sent MCCURDY a picture of a USPS tracking number corresponding to a package being sent to Eastlake, Ohio.

17. On or about February 21, 2021, at approximately 2:30 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, "Yo, 2000." STEVENSON replied, "Ok, You need them, Ok let me put them together, We good." MCCURDY texted, "Ok I'll be there around 4, I'm outside."

18. On or about February 22, 2021, at approximately 12:58 p.m., REGINALD MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON texted, "Real percs 30, 17.00." MCCURDY replied, "They whole city junkies they don't care if the real our fake."

19. On or about February 27, 2021, at approximately 2:32 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, "I need to come holla at you later." STEVENSON replied, "same thing?" MCCURDY texted, "He

said like 4000, He gone let me no when he land.” STEVENSON texted, “I got u.”

STEVENSON sent a photo of four bags of blue pills.

20. On or about March 15, 2021, at approximately 7:08 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON texted, “I got a bunch of glass, U need it, Cheap.” MCCURDY texted, “What’s the ticket.” STEVENSON replied, “I’ll send it to u for 24 a pound, 2400.” MCCURDY texted, “Ok when you be able to send it.” STEVENSON replied, “I can get them to u by next week. How many u want.” MCCURDY texted, “I’m start with 2 because I gotta see what’s up with it first.”

21. On or about April 9, 2021, at approximately 7: 33 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON sent a video of a bucket with what appears to be methamphetamine. MCCURDY texted, “Send it to me.” STEVENSON replied, “Next go round I gotta hurry up and finish these so I can re Get a addy. Next week.” MCCURDY texted, “Bet I’m send it to you tomorrow.”

22. On April 29, 2021, MCCURDY sent a text message to STEVENSON, “[XXXX] W 48th street Cleveland Ohio 44102.”

23. On or about July 4, 2021, at approximately 5:41 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, “He got the bread for 8 [8,000 tablets] right now, You want me to pull up.”

24. On July 5, 2021, MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON texted, “He want 8?” and “Ok let me get price” and “No more than 1300 tho” and “He got all 8.” MCCURDY texted, “5min away” and “I’m outside.”

25. On July 7, 2021, at approximately 12:04 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, "I ain't even see you called me but oboy said he want the samething." STEVENSON replied, "He said they different?" and "I saw they was different sizes."

26. On or about August 5, 2021, at approximately 9:33 a.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, "Let me get 1 I be there Tuesday." STEVENSON replied, "U want me to go grab the cash from Kim." MCCURDY texted, "Let me just get 3 [3,000 tablets]" and "And yeah you can." STEVENSON replied, "U want me to go grab the cash from Kim." STEVENSON sent a screenshot showing a UPS tracking number 1ZW0229F0202443022.

27. On or about August 12, 2021, at approximately 2:32 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, "Yo see what's up with 2000." STEVENSON replied, "Let me know when u want em." MCCURDY texted, "Today if you can" and "Ima come grab them things tomorrow around 1" and "I'm waiting on my daughter to get off work" and "It 2 racks each right [\$2,000]." STEVENSON texted, "I'll brinyem just give me 100 for gas" and "On my way" and "Broadway" and "I'm here I parked around the corner at this bitch house."

28. On or about August 18, 2021, at approximately 11:30 a.m., MCCURDY and VENTURA engaged in a text message conversation on the telephone. VENTURA texted, "Its here" and "Give me B number." MCCURDY replied "8048180."

29. On August 19, 2021, MCCURDY and VENTURA engaged in a text message conversation on the telephone. At this time, the conversation about the package continued, and

MCCURDY asked, "Where you meet him." VENTURA replied, "Mayfield somewhere" and "By hillcrest."

30. On or about August 29, 2021, at approximately 1:57 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, "Ima need like 5 [5,000 tablets] in couple hours."

31. On August 29, 2021, at approximately 2:55 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON texted, "u pulling up." MCCURDY replied, "Yeah I thought you said 6."

32. On or about October 17, 2021, at approximately 2:10 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, "I need some blues and ice." STEVENSON replied, "I got u." MCCURDY texted, "1blue 4ice" and "Ok I got flight later is you gone be able to shoot it to Kim if I leave before then." STEVENSON texted, "I got the blues here tho."

33. On October 18, 2021, at approximately 9:30 a.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON texted, "Just come to the house." MCCURDY replied, "I'm at the gate."

34. On or about November 3, 2021, at approximately 4:39 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON texted, "Ima overnight u my bank card" and "U got a addy" and "I'll fly out to get the rest after that" and "U can put 5 [\$500] a day in the atm."

35. On or about November 6, 2021, at approximately 1:22 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted,

“What’s the code,” and STEVENSON replied with a four-digit pin code along with a photo of Bank of America locations in the area of Cleveland, Ohio.

36. On November 19, 2021, GLENN went to an ATM at a bank in Euclid, Ohio and deposited \$500 into STEVENSON’s Bank of America account.

37. On November 20, 2021, GLENN went to an ATM at a bank in Mayfield Heights, Ohio, deposited \$500 into STEVENSON’s Bank of America account.

38. On November 22, 2021, GLENN went to an ATM at a bank in Lyndhurst, Ohio, and deposited \$500 into STEVENSON’s Bank of America account.

39. On November 28, 2021, GLENN went to went to an ATM at a bank in Euclid, Ohio, and deposited of \$500 into STEVENSON’s Bank of America account.

40. On or about November 29, 2021, at approximately 9:58 p.m., MCCURDY and VENTURA engaged in a text message conversation on the telephone. MCCURDY texted, “Send me your address.” VENTURA replied, “New one? Or old one?” MCCURDY texted, “Old one.” VENTURA replied “4### Beverly Hills dr apt 129 Brunswick, Oh 44212”.

41. On November 30, 2021, a parcel was mailed from Youngstown, Arizona, at the direction of MCCURDY to VENTURA containing approximately 2,000 M-30 tablets.

42. On November 30, 2021, GLENN went to an ATM at a bank in Lyndhurst, Ohio, and deposited \$500 into STEVENSON’s Bank of America account.

43. On December 11, 2021, GLENN went to an ATM at a bank in Euclid, Ohio, and deposited \$3,160.00 into STEVENSON’s Bank of America account.

44. On or about December 15, 2021, at approximately 12:24 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, “Let me 2k [2,000 tablets] of them and I got 3 racks now let me give you the band in a week.

STEVENSON replied, "U can send the 8 [\$8,000] out next week i got ur blues ready now" and "Aiit u want me to drop them with Kim." MCCURDY texted, "Yeah Appreciate it." STEVENSON replied, "Tell Kim im on the way."

45. On December 16, 2021, MCCURDY went to an ATM at a bank in Euclid, Ohio, and deposited \$4,000 into STEVENSON's Bank of America account.

46. On January 5, 2022, a person known to the Grand Jury, used her notes application on her cell phone to create a note that said "Venture."

47. On January 6, 2022, a person known to the Grand Jury, used the Postal Office in Arizona to mail a parcel containing packing materials and a glass mason jar with a plastic bag containing approximately 2,000 round blue tablets to "Ms Venture" (VENTURA) to the address of 4XXX Beverly Hill Drive, Brunswick, Ohio 44212.

48. On January 10, 2022, VENTURA engaged in a text conversation with a person known to the Grand Jury. VENTURA texted, "Hey honey, I just tried calling you. Check to see if any packages came please."

49. On January 11, 2022, at approximately 12:30 p.m., a person known to the Grand Jury arrived at 4XXX Beverly Hills Drive, Brunswick, Ohio 44212, VENTURA's residence, and took possession of the package described above mailed by a person known to the Grand Jury, now containing fake drugs and carried it into the residence.

50. On January 11, 2022, a short time later, this same person known by the Grand Jury, brought the package back outside of VENTURA's residence and placed it back on the porch.

51. On or about March 6, 2022, at approximately 11:58 a.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. STEVENSON texted,

“How many u was tryna grab.” MCCURDY replied, “10000” and “If you want I can grab 5000 today and get the other 5 tomorrow.” STEVENSON texted, “I grabbed the 15k [15,000 tablets]” and “Ill have the 10 [10,000 tablets] ready as soon as u are.” MCCURDY texted, “I be ready tomorrow”.

52. On or about March 15, 2022, at approximately 12:57 p.m., MCCURDY and STEVENSON engaged in a text message conversation on the telephone. MCCURDY texted, “You can drop them off to her” and “They the same ones” and “Shiny lights ones.” STEVENSON replied, “I sell them everyday”. There was a discussion about price change, and STEVENSON sent a photo of a bag of blue pills sent to MCCURDY with a Corvette and Harley in background and then texted, “I been knocking on the doir.” MCCURDY texted, “You got that bread,” and STEVENSON replied, “Yea i got it it was missing 500 tho.”

53. On or about March 18, 2022, at approximately 12:05 p.m., MCCURDY and VENTURA engaged in a text message conversation on the telephone. MCCURDY texted, “Wya” and “Pick up come.” VENTURA replied, “Not yet.” MCCURDY texted, “You got it” and then sent a screenshot from USPS showing tracking number 9505526546062075645406 for a package that contained 2,000 fentanyl tablets. MCCURDY and VENTURA argued about whether a parcel arrived and then connected via FaceTime. VENTURA texted a person known to the Grand Jury, “U def delivered that package”.

54. March 18, 2022, at approximately 11:00 p.m., VENTURA searched online using for “pill press machine for sale” and “pill press machine powder.”

55. On March 18, 2022, a person known to the Grand Jury, using her cellphone, looked up the tracking number of a package sent from Arizona to Brunswick, Ohio (VENTURA package).

56. On March 19, 2021, VENTURA searched online using for “lfa tablet press.” VENTURA visited the link for “TDP Range - Desktop Tablet Press Range - LFA Tablet Presses” website associated with LFA Tablet Presses. VENTURA then ordered a tablet press to be shipped to her residence.

57. On or about and during the month of March 2021, VENTURA received the pill press.

58. On May 7, 2022, at approximately 10:26 a.m., MCCURDY and STERLING engaged in a telephone conversation. STERLING asked, “What stuff he need?” MCCURDY replied, “You know, just the wap, just the fatty wap shit [fentanyl].” STERLING replied, “Oh . . .” A short time later during the conversation, MCCURDY stated, “Yeah that’s what I told him too, I ain’t want him to touch it until you got everything. I want to make sure that the gloves, the face mask, and the Narcan, I told him I’ll pay for everything and shit. That’s why I want you to be there too so you don’t have to be near the s--t [fentanyl] but you could just watch him and make sure he’s cool.”

59. On May 7, 2022, at approximately 10:26 a.m., MCCURDY and STERLING engaged in a telephone conversation. MCCURDY told STERLING “Uh . . . grab a couple hundred of them blues [pressed fentanyl pills], like three hundred.” STERLING asked, “How many?” MCCURDY reiterated, “Prolly about three hundred, they all bad though.”

60. On May 7, 2022, at approximately 10:26 a.m., MCCURDY and STERLING engaged in a telephone conversation where MCCURDY was directing STERLING to weigh out for distribution six ounces of fentanyl.

61. On May 7, 2022, at approximately 5:35 p.m., STERLING called MCCURDY on the telephone. During the conversation, STERLING asked MCCURDY which key she should

use. MCCURDY told STERLING which keys to use to open the screen and the main door. MCCURDY told STERLING that he can see her on the camera. MCCURDY told STERLING that it was in the last closet, by his room. MCCURDY gave STERLING his safe code, 159#, and STERLING put the code into the safe. MCCURDY told STERLING to grab a couple hundred of the blues. STERLING asked MCCURDY how many. MCCURDY told STERLING about 300 but that they are all bad. STERLING asked MCCURDY where the ruler is and whether it was upstairs. MCCURDY told STERLING that she will probably have to climb on a chair. STERLING asked MCCURDY if he wanted UM to come there. MCCURDY affirmed. MCCURDY told STERLING that a male known to the grand jury wanted 50 blues around 7:00 , and he (MCCURDY) would tell him to go there. MCCURDY told STERLING to lock the basement door. MCCURDY read STERLING a text message from Lyft about renting a car. MCCURDY gave STERLING directions on how to take the battery out of the ring camera for STERLING to charge it. STERLING told MCCURDY that she is going to check to see where a person known to the Grand Jury was, because he was supposed to be coming up Superior.

62. On May 12, 2022, at approximately 4:01 p.m., MCCURDY and STERLING engaged in a telephone conversation. During this call, MCCURDY stated, "Uh, motherf--kers, uh, what I was about to say, what's-his-name want, uh, 6 zips of food and s--t. He'll be ready in, like, a couple hours. On . . ." STERLING replied, "Oh . . . uh, I still don't even got your key. Arnold still got your key for one, and I'm about, uh, leave at 6:00."

63. On May 12, 2022, at approximately 4:52 p.m., MCCURDY and STERLING engaged in a telephone conversation. STERLING asked, "You wanted me to leave it [fentanyl] in your car or give it to Arnold? 'Cause Arnold gone again." MCCURDY replied, "Uh, yeah, just leave it in the truck for now." STERLING stated, "Six all together or, like, do you want me

to split them [fentanyl] up?" MCCURDY responded, "Yeah, you can put it all together. You know how much it weigh, right?" STERLING sated, "I don't but [unintelligible] do."

MCCURDY replied, "One twelve. Yeah, one twelve plus fifty-six is uh." STERLING stated, "Three, forty-eight." MCCURDY stated, "Nah, yeah, nah, whatchu say?" STERLING stated, "Three hundred and forty-eight grams. Twenty-eight times six. Twenty-eight times."

MCCURDY stated, "Nah, hell nah, that ain't, that's too much." STERLING stated, "Twenty-eight times, oh, yeah, I'm trippin', one fifty-eight." MCCURDY replied, "Yeah, one sixty-eight, you trippin'. [Laughs] You 'bouta give my whole bag away, that's all I got left. That's only in there, that's about three fourteen or something, three sixteen."

64. On May 13, 2022, MCCURDY and STERLING possessed or controlled a tablet press with various pills on the base of it and 325.9 grams of fentanyl.

65. On May 13, 2022, at approximately 7:42 p.m., MCCURDY and an unidentified female engaged in a telephone conversation. MCCURDY told her to tell his baby that he loves her, since he does not know when the next time he will see her again. MCCURDY told the unidentified female that there are things going on, someone raided his house and took his stuff [fentanyl and pill press], he does not know if it was the police or the "Feds." MCCURDY told the unidentified female that his neighbors told him it was "white boys." MCCURDY told the unidentified female that he cannot even talk right now, he is sad, and that he will talk to her later.

66. On May 16, 2022, at approximately 1:32 p.m., MCCURDY and GLENN engaged in a telephone conversation. GLENN said, "She said, ah, what blues [pressed fentanyl tablets] are you talking about?" MCCURDY replied, "It was like ninety of them left. The odd shit. Tell them Arnold [A.H.] have them or something. The, ah, the key." GLENN said, "Yeah, that's

what she said, that he's supposed to have them." MCCURDY said, "Yeah, tell him it's like a hundred or something."

67. On May 18, 2022, at approximately 12:05 p.m., MCCURDY and GLENN engaged in a telephone conversation. MCCURDY directed GLENN, "I need you to give somethin' [Fentanyl tablets] to my boy, uh, black hat, uh, the rest of them things that Trina gave you." GLENN said, "I ain't going to be able to do it right away, 'cause I gotta go somewhere. I got a job at two. And that's in Mentor." MCCURDY asked where the pills [fentanyl tablets] were, and GLENN replied, "Not at mine." MCCURDY pleaded with GLENN, "This is the last of my stuff [fentanyl tablets] I'm just trying to get it gone, man so I can make some more money, man. I need my money to come back in, my tomorrow, you know I can't live like this." GLENN asked, "Where is he gonna, where he going to be at?" MCCURDY advised, "He [buyer] stay around the corner from you, on the next street." MCCURDY stated, "Put it [fentanyl tablets] in his mailbox, or he going to be there tho'. I'm about to call him right now and tell him."

68. On May 18, 2022, at approximately 1:32 p.m., in the area of Lee Blvd and Forest Hills Blvd., in Cleveland, Ohio, GLENN possessed a pill bottle containing 10.6 grams of blue pills containing fentanyl.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B), 846, Title 18, United States Code, Section 2)

The Grand Jury further charges:

61. On or about November 10, 2019, in the Northern District of Ohio, Eastern Division, Defendant REGINALD MCCURDY did knowingly and intentionally attempt to

distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and 846, and Title 18, United States Code, Section 2.

COUNT 3

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2)

The Grand Jury further charges:

62. On or about May 13, 2022, in the Northern District of Ohio, Eastern Division, Defendant REGINALD MCCURDY did knowingly and intentionally possess with intent to distribute approximately 325.9 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 4

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2)

The Grand Jury further charges:

63. On or about May 13, 2022, in the Northern District of Ohio, Eastern Division, Defendants ANGELINA VENTURA and CHERRELL GLENN did knowingly and intentionally possess with intent to distribute approximately 325.9 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 5

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2)

The Grand Jury further charges:

64. On or about May 18, 2022, in the Northern District of Ohio, Eastern Division, Defendant REGINALD MCCURDY and CHERRELL GLENN did knowingly and intentionally possess with intent to distribute approximately 10.2 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

COUNTS 6-10

(Use of a Communications Facility to Facilitate a Felony Drug Offense, 21 U.S.C. § 843(b))

The Grand Jury further charges:

65. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the Defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Sections 846 and 841(a)(1):

Count	Defendants	Date	Time (EST)
6	REGINALD MCCURDY	March 26, 2021	1:31 p.m.
7	KING STEVENSON	March 27, 2021	4:40 p.m.
8	KATRINA STERLING	March 27, 2021	6:55 p.m.
9	CHERRELL GLENN	March 27, 2021	8:14 p.m.
10	ANGELINA VENTURA	March 29, 2021	12:15 a.m.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 11

(Interstate Travel in Aid of Racketeering,
18 U.S.C. § 1952(a)(3))

The Grand Jury further charges:

66. On or about July 25, 2021, in the Northern District of Ohio, Eastern Division and elsewhere, Defendant REGINALD MCCURDY traveled in interstate from the State of Arizona to the State of Ohio with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is the

knowing and intentional possession and distribution of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, with intent to distribute, in violation of Title 21, United States Code, Sections 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

FORFEITURE

The Grand Jury further charges:

67. The allegations of Counts 1-11 of this Indictment are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 981(a)(1)(C); Title 18, United States Code, Section 924(d)(1); and Title 28 United States Code, Section 2461(c). As a result of these offenses, Defendants REGINALD MCCURDY, KING STEVENSON, KATRINA STERLING, CHERRYL GLENN, ANGELINA VENTURA, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; and any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; any firearms and ammunition involved in or used in such violations; and any property real or personal, which constitutes or is derived from proceeds traceable to such violations; including, but not limited to, the following:

- a) Springfield pistol, 10MM - serial # AT216969, with firearm accessories and ammunition, seized on June 1, 2022, pursuant to the execution of a search warrant at the Cleveland, Ohio, residence of KATRINA STERLING;

- b) Beretta Px4 Storm .40 caliber semi-automatic pistol (SN: PY82951), with firearm accessories and ammunition, seized on June 1, 2022, pursuant to the execution of a search warrant at the Phoenix, Arizona, residence of KING STEVENSON;
- c) Springfield Armory XD-9 9mm semi-automatic pistol (SN: S3778427), with firearm accessories and ammunition, seized on June 1, 2022, pursuant to the execution of a search warrant at the Phoenix, Arizona, residence of KING STEVENSON;
- d) FN Herstal Five-Seven semi-automatic pistol (SN: 386306012), with firearm accessories and ammunition, seized on June 1, 2022, pursuant to the execution of a search warrant at the Phoenix, Arizona, residence of KING STEVENSON;
- e) Anderson Manufacturing AM-15 Rifle (SN: 20150494), with firearm accessories and ammunition, seized on June 1, 2022, pursuant to the execution of a search warrant at the Phoenix, Arizona, residence of KING STEVENSON;
- f) Sig Saur 1911 .45 caliber semi-automatic pistol (SN: 54B092167), with firearm accessories and ammunition, seized on June 1, 2022, pursuant to the execution of a search warrant at the Phoenix, Arizona, residence of KING STEVENSON; and
- g) 2020 Harley Davidson, Model FLTRX, Black in color, VIN: 1HD1KHC19LB634304, GA registration ETR9630, seized on June 1, 2022, pursuant to the execution of a search warrant at the Phoenix, Arizona, residence of KING STEVENSON.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.